REMARKS

Claim Rejections - 35 USC §102

Claims 12 and 13 are rejected under 35 U.S.C. 102(b) as being anticipated by Takeuchi et al. (US 5,418,432).

In response to this rejection, Applicant respectfully traverses the rejection as follow.

Regarding claim 12, as previously presented, recites in part:

> "... a primary sub-system including a primary driving circuit ... and a primary feedback circuit connected in series; and
>
> at least one secondary sub-system including a secondary driving circuit... and a secondary feedback circuit connected in series;
>
> wherein the primary photosensitive element is further linked to the secondary feedback circuit, the **primary feedback circuit** being configured so as to be **solely influenced by the primary photosensitive element** ..." (Emphasis added.)

Applicant submits that the subject matter of claim 12, as currently amended, is neither taught nor suggested by Takeuchi '432 or any of the other references, taken alone or in combination.

Takeuchi '432 disclose a luminary device that includes three light sources (12R, 12G, 12B), three quantity-of-light detectors (13R, 13G, 13B),

three light dimmers (14R, 14G, 14B), and a correction operating means (20). The correction operating means (20) includes, among its various elements, three light signal converters (18R, 18G, 18B), and two comparison operating means (19a and 19b). The Examiner contends that the comparison operating means (19b) is a primary feedback circuit and that the comparison operating means (19a) is a secondary feedback circuit.

As seen from the illustrations of Takeuchi '432, the signals from three quantity-of-light detectors (13R, 13G, 13B) are connected to three respective light signal converters (18R, 18G, 18B). However, each comparison means (19a, 19b) receives, from a respective divider, a quotient based upon two of the converted signals. Both quotients factor in a signal regarding one (e.g., G) of the three colors and each, in turn, rely on a signal regarding a respective one (e.g., B, R) of the remaining two colors. As such, neither comparison means (19a, 19b) is able to qualify as the "primary feedback circuit" in the context of claim 12, as neither comparison means (19a, 19b) is capable of producing an output signal on the basis of a single color signal. Accordingly, Takeuchi et al. '432 fails to teach or suggest the illumination system as defined by claim 1, as amended.

Claim 13, as currently amended, recites in part:

> "...the primary sub-system and said at least one secondary sub-system are **mainly separate from each other** except the secondary feedback circuit is also influenced by said primary sub-system for obtaining consistent illumination between the primary sub-system and the secondary sub-system, **the primary**

feedback circuit being configured so as to be solely influenced by the primary photosensitive element." (Emphasis added.)

Applicant submits that the subject matter of claim 13, as currently amended, is neither taught nor suggested by Takeuchi '432 or any of the other references, taken alone or in combination.

The Examiner contends that "converter 18G sends signal to secondary feedback circuit 19a through divider 23" in Takeuchi is comparative to "the secondary feedback circuit is also influenced by said primary sub-system" in the claim 13. Actually, in Takeuchi, **the comparison operating means 19a receives a comparison resultant signal**, i.e., V_{yr} /V_{yg}, **relative to the detectors 13R/13G** from the divider 23. Meanwhile, **the comparison operating means 19b receives a comparison resultant signal**, i.e., V_{yb} /V_{yg}, **relative to the detectors 13B/13G** from the divider 24. Both quotients factor in a signal regarding one (e.g., G) of the three colors, and each quotient, in turn, relies on a signal regarding a respective one (e.g., B, R) of the remaining two colors. As such, neither comparison means (19a, 19b) is able to qualify as the "primary feedback circuit" in the context of claim 13, as neither comparison means (19a, 19b) is capable of producing an output signal on the basis of a single color signal. Therefore, the method, as set forth in amended claim 13, is neither disclosed, taught, nor suggested by Takeuchi et al. or any of the other cited references, taken alone or in combination.

Accordingly, Applicant submits that claims 12 and 13 are submitted to be novel, unobvious, and patentable over Takeuchi '432 under both U.S.C. 102(b) and U.S.C. 103(a). Further, Applicant submits that neither

Takeuchi et al. nor any of the other cited references, alone or in combination, teaches, discloses, or otherwise suggests the subject matter as set forth in amended claims 12 and 13. Reconsideration and withdrawal of the present rejection and allowance of claims 12 and 13 are therefore respectfully requested.

Claim Rejections - 35 USC §103

Claims 1-3 are rejected under 35 U.S.C. 103(a) as being unpatentable over Takeuchi et al. (5,418,432) in view of Coaton et al. (textbook section).

In response to this rejection, Applicant has amended claim 1 and otherwise respectfully traverses the rejection.

Claim 1, as amended, recites in part:

> "...the primary feedback circuit receives the photoelectric current of a single corresponding photosensitive element and provides an output signal to the primary driving circuit, and said secondary feedback circuit receives at least two photoelectric currents of said photosensitive elements and provides at least an output signal to said secondary driving circuit ...

Applicant submits that the subject matter of claim 1, as currently amended, is neither taught nor suggested by Takeuchi '432, Coaton et al., or any of the other references, taken alone or in combination.

For similar reasons as set forth above with respect to claims 12 and 13,

Applicant submits that Takeuchi '432 does not disclose or suggest a primary feedback circuit (i.e., one of comparison means (19a, 19b)) that can provide an output based upon "the photoelectric current of a single corresponding photosensitive element", as required by claim 1, as amended. Accordingly, Takeuchi et al. '432 fails to teach or suggest the subject matter as set forth in amended claim 1.

Coaten et al. is cited as a teaching of fluorescent light usage and does not overcome the shortcomings associated with Takeuchi '432. As such, Takeuchi '432 in view of Coaten et al. fails to teach or suggest each and every element of amended claim 1.

Accordingly, claim 1, as well as claims 2-3 depending therefrom, is submitted to be unobvious and patentable under 35 U.S.C. 103 over the prior art cited by Examiner; and the withdrawal of the rejection and allowance of claims 1-3 are respectfully requested.

Allowable Subject Matter

The Examiner has indicated that claims 4-11 set forth allowable subject matter, for which consideration the Examiner is respectfully thanked. Applicant has chosen not to rewrite any of these claims in independent form at this juncture and, instead, submits that such claims are currently allowable based upon their dependence on amended claim 1, which is in condition for allowance for the reasons set forth above.

In view of the foregoing, the present application as claimed in the pending claims is considered to be in a condition for allowance, and an action to such effect is earnestly solicited.

Respectfully submitted,
Jyh Chain Lin

By Jeffrey T. Knapp

Jeffrey T. Knapp
Registration No.: 45,384
Foxconn International, Inc.
1650 Memorex Drive
Santa Clara, CA 95050
Tel. No.: (714) 626-1229